

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

PRO SE CIVIL COMPLAINT

Case No. 8:14cv264

Chrocia Waddell  
Plaintiff

Dr. Richard Osterholm  
Defendant

- A. Chrocia Waddell 2652 East Juniper Avenue Phoenix, AZ 85032  
602-795-4853
- B. Dr. Richard Osterholm 10170 Nicholas street Omaha, NE  
68046 402-391-3800

- A. Dr. Richard Osterholm became my physician of record in December of 1979. The events that have brought us here happened about or around 1998 to 2010. I have always problems with my stomach being sick and Dr. Osterholm gave me Compazine for the nausea. This was done on an on going basis. I moved to Phoenix in 2006 and I still came back to see Dr. Osterholm and he prescribed medicine for me including the Compazine. At no time did Dr. Osterholm do any tests to find out why I was sick he continued to give me the Compazine.
- B. In 2010 I was seeing a Doctor here in phoenix by the name of Isabel Musial and she noticed that I was moving strangely. At that time I was unable to sign my name because I shook all over my body. My mouth was the

OFFICE OF THE CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
14 SEP -9 PM 1:45

worst I made smacking sounds ,my mouth was stretched sometimes to the very end of its beginning I had no control over my mouth or my body movements. Dr. Musial sent me to a Neurologist Dr. Jeffrey Gitt whom I saw approximately 3 to 4 times. He stated that he was unable to help me and sent me to the Movement Disorder Clinic at Barrows Neurological center and I was seen by Dr. Anthony Santiago.

I want you to understand that Dr. Osterholm saw me in his office in Omaha in 2011 and commented on my lip smacking. At that time the movements were basically confined to my mouth. At no time was I ever told what I had until October of 2012 at which time Dr. Santiago and his medical student wrote me a letter and told me that I was suffering from Tardive Dyskinesia. Dr Santiago has since moved on to the University of Minnesota to do research so now I am being seen by Dr. Naomi Salins.

The repercussions of my disease have been many that greatest on being the fact that I was making no saliva so when you have no saliva your teeth rot and that is exactly what happened to me. In 2013 I had to have all my teeth pulled and am need of dentures with implants because my mouth moves all the time. Other side effects have been that some days I am unable to speak so that you can understand me I don't go to church any more because of the facial and mouth movements. I don't like to be around people because I am very self conscious of my movements.

This disease has ruined my life. For someone who likes to talk and visit that's pretty well overwith.

Dr. Osterholm Has been touted as being the "Most learned Internal Medicine Man in Omaha" which leads me to believe that he should of known that by giving me the Compazine for as long as he did that the end result

should not be a surprise for anyone. The Hippocratic oath says do No harm well the harm has been done and he just walked away scott free with out looking back I have suffered and continue to do so. I was told By dr. Salins that The movement is not going to get any better and could get worse. My family has suffered seeing my depression and the withdrawl from my life.

### III. STATEMENT OF JURISDICTION

Diversity of Citizenship( a matter between citizens of different states in which the amount in controversy exceeds \$75,000)

### V. RELEIEF

I am asking the court to try and make me whole by awarding the sum of \$5million dollars for the suffering I have done in the past and will continue to suffer

### VI. EXHAUSTION OF ADMINISTRATIVE PROCEDURES

- A. Have the claims which you make in this civil action been presented through any type of administrative procedure within any state or federal government agency
- B. NO
- C. I was unaware of that route being a possiblility

### IV. STATEMENT OF VENUE

Dr. Osterholm lives and works in Nebraska and the injury began in Nebraska

VII. ARE YOU REQUESTING TRIAL BY A JURY OR BY A JUDGE?

Jury

VIII. VERIFICATION

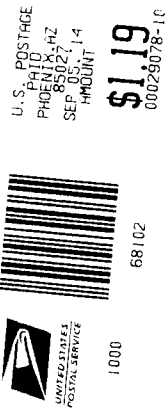
**I declare under penalty of perjury that the foregoing is true and correct**

**Date executed**

**Signature of Plaintiff.**

WADDELL  
21052 EAST JUNIPER AVE  
PHOENIX, AZ 85032

**FIRST CLASS**



OFFICE of The Clerk  
United States District Court  
Roman L Hruska U.S. Courthouse  
111 18th Plaza Suite 1152

Omaha, NE 68102-1322

**RECEIVED**

SEP 9 - 2014 Official Business

CLERK  
DISTRICT COURT  
OMAHA